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## SENT VIA OVERNIGHT FEDEX

National Freedom of Information Officer U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW (2822T) Washington, DC 20460 (202) 566-1667

> Re: <u>Freedom of Information Act (FOIA) Request</u> Ford Motor Company's 6.0 Liter Diesel Engine

## Dear FOIA Officer:

I am making a request pursuant to the Freedom of Information Act (hereinafter "the Act"). Gordon & Rees Scully Mansukhani, LLP represents Ford Motor Company (hereinafter "Ford") in certain litigation currently pending in California involving the 6.0 Liter (hereinafter "6.0L") diesel engine equipped in the following vehicles: 2003-2007 Ford F-250s, F-350s, F-450s, and F-550s; 2003-2004 Ford Expeditions; and 2003-2010 Econoline Vans. We are requesting the below information, documents and items related to any and all submissions to the U.S. Environmental Protection Agency (hereinafter "EPA") that pertain to the above-identified diesel engine. We are requesting the following information and documents via expedited processing or as soon as possible.

- 1. Please provide any and all documents submitted to the EPA relating to the 6.0L diesel engine from 1997 through the present.
- 2. Please provide any and all documents submitted to the EPA relating to the 6.0L diesel engine regarding emissions certification process from 1997 through the present.
- 3. Please provide all white papers submitted to the EPA relating the 6.0L diesel engine from 1997 through the present.
- 4. Please provide any and all documents reflecting any investigation by the EPA into the emissions certification, compliance or testing of the 6.0L diesel engine from 1997 through the present.
- 5. Please provide any and all documents in the EPA's possession, custody and/or control relating to the 6.0L diesel engine from 1997 through the present.

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6. Please provide any and all documents sent to the EPA from Navistar, Inc., Navistar International Corp. or International Harvester, including any of these companies' subsidiaries or business units, related to the 6.0L diesel engine from 1997 through the present.

For purposes of this request, the term "documents" shall mean and include documents in their respective native formats (paper, electronic or digital); electronic communications (emails) in either hard copy or their native file format; photographs (actual or laser-quality copies thereof, or if they were taken digitally, in their native file format, such as .JPG, .PNG, .PDF, etc.); audio recordings in their native file format, such as .MP3, .MOV, etc.; and video recordings in their native file formats, such as .MP3, .MOV, etc. If applicable, please release all reasonably segregable non-exempt portions of these documents, as is required by the Act.

I am willing to pay required fees for this request, but please contact me at the phone number or email address shown above and notify me first of the dollar amount. I look forward to receiving your response within twenty (20) business days as required by the Act.

Thank you very much for your assistance with this request. If you have any questions, please do not hesitate to contact me at your earliest convenience.

Very Truly Yours,

GORDON & REES SCULLY MANSUKHANI LLP

Spencer P. Hugret

SPH

cc: Kyle Sandefur, Counsel, Ford Motor Company (VIA EMAIL)